



December 12, 2018

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: Citizens Broadband Radio Service  
Comments Regarding Request for Waiver of CBRS Transition Deadline  
WT Docket No. 18-353**

Dear Ms. Dortch:

Wisper ISP, Inc. supports grant of the petition for waiver filed by the Wireless Internet Service Providers Association and the Utilities Technology Council. We agree that the transition period for 3650-3700 MHz Service licensees should be extended from April 17, 2020 to January 8, 2023. This extension will enable us, and other similarly-situated licensees, to have enough time to come into compliance with the new CBRS equipment rules.

Wisper is a fixed wireless provider that provides service to more than 10,000 customers in rural parts of Illinois, Missouri and Oklahoma. We are currently using 3650-3700 MHz in our networks, some of which have been expanded with software-upgradeable equipment and some that use older WiMAX or proprietary transmitters. We were the successful bidder for more than \$220 million in Connect America Fund support, and we plan to rely on CBRS spectrum (and other bands) to help meet our build-out and performance obligations.

Wisper sees a number of challenges associated with an April 2020 deadline to migrate our operations to Part 96. The FCC premised its five-year transition period on the belief that Part 96 equipment, the Spectrum Access System and Environmental Sensing Capability and proxy controller devices would be available. That is not the case. Although some equipment has been certified to operate under Part 96, we cannot begin the conversion process until the SAS and ESC are tested, certified and on line. Moreover, there will be a large number of licensees that will be looking to the same equipment vendors and tower crews to upgrade their facilities, and it is not likely that the supply chain and the human resources will be available. The supply chain simply will not be robust enough to accommodate the needs of industry.

In addition, we expected that we would have two or three annual budget cycles to pay for the transition to Part 96 equipment. Assuming the April 2020 date stands, we would have only one budget cycle to pay for the work that will need to be done and the equipment that we will need to purchase. That will constrain our ability to pay for other things and potentially slow the pace of our expansion efforts, which is focused on bringing fixed broadband to places where consumers lack choice. The “domino effect” of an entire incumbent industry transitioning through a narrow window is a legitimate concern that would be addressed by a blanket waiver.

Wisper does not believe that the waiver will prejudice future CBRS users. Initially, most will – or should – initially deploy GAA in the 3550-3650 MHz band which has no commercial users and therefore less congestion. We believe it will take some time for this 100 megahertz to have sufficient use such that GAA users will then seek to deploy in the 3650-3700 MHz band. Therefore, we think that the benefits of the waiver outweigh any detriment to future use of the band.

We strongly support the waiver and request that the FCC grant the WISPA/UTC petition.

Respectfully submitted,

A handwritten signature in black ink that reads 'Nathan T. Stooke'.

Nathan Stooke, President



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